

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
Caption in compliance with D.N.J. LBR 9004-1

GIBBONS P.C.

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*Counsel to the Debtors
and Debtors-in-Possession*

In re:

NEW ENGLAND MOTOR FREIGHT, INC.,
et al.,

Debtors.¹

Chapter 11

Case No. 19-12809 (JKS)
(Jointly Administered)

Hearing Date: April 16, 2019 @ 10:00 a.m.

Judge: Hon. John K. Sherwood

ADJOURNMENT REQUEST

1. I, KAREN A. GIANNELLI, ESQ.,

☒ am the attorney for: New England Motor Freight, Inc. *et al.*, Debtors and Debtors in Possession,

☐ am self represented,

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

and request an adjournment of the following hearing for the reason set forth below.

Matter: Debtors' Motion for Entry of Interim and Final Orders: (A) Authorizing the Debtors to (I) Continue Their Cash Management System; (II) Honor Certain Related Prepetition Obligations; (III) Maintain Existing Business Forms; and (IV) Continue to Perform Intercompany Transactions; (B) Authorizing and Directing the Debtors' Banks to Honor All Related Payment Requests; (C) Granting Interim and Final Waivers of the Debtors' Compliance with Section 345(b) of the Bankruptcy Code; (D) Scheduling a Final Hearing; and (E) Granting Related Relief [Dkt No. 12] with related Order [Dkt No. 39] (the "Cash Management Motion").

Current hearing date and time: April 16, 2019 @ 10:00 a.m.

New date requested: May 16, 2019 @ 11:00 a.m.

Reason for adjournment request: The U.S. Trustee requested a 30-day extension of time to respond to the Cash Management Motion and agrees in connection with that request that the hearing on the Final Order of the Cash Management Motion be continued for 30 days to the May 16 hearing date, which is already the hearing date for the Second Interim Cash Collateral Order.

2. Consent to adjournment:

☒ I have the consent of all parties.* ☐ I do not have the consent of all parties (explain below):
*all parties that may object to the Cash Management Motion.

I certify under penalty of perjury that the foregoing is true.

Date: April 8, 2019

/s/ Karen A. Giannelli
Karen A. Giannelli, Esq.

COURT USE ONLY:

The request for adjournment is:

- ☒ Granted New hearing date: 5/16/2019 @ 11:00 ☐ Peremptory
- ☐ Granted over objection(s) New hearing date: _____ ☐ Peremptory
- ☐ Denied